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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH EDWARD GREENLAND,

Defendant.

Case No. 2:21-cr-160-APG-VCF

**Government's Motion for Leave to File  
Stipulation for Protective Order Under  
Seal**

Contemporaneous with this motion, the government is filing a stipulation between the parties for a protective order. The stipulation references and discusses confidential information regarding law enforcement officers which, if made public, could invite speculation and inaccurate inference from the public. Due to the sensitive nature of the information and the potential for abuse and misidentification, we believe the stipulation should be filed under seal and remain under seal. Moreover, the stipulation itself contains little information noteworthy to the public, so the prejudicial consequences of disclosure would outweigh the public's qualified right of access to judicial records. The government therefore requests leave to file the stipulation under seal. The government also requests that any accompanying order resulting from the stipulation be kept under seal.

**CONCLUSION**


For the foregoing reasons, the government respectfully requests leave to file under seal the parties' stipulation for a protective order, and requests that the Court maintain the stipulation and any accompanying order under seal.

DATED this 24th day of January, 2022.

CHRISTOPHER CHIOU  
Acting United States Attorney

s/Jim W. Fang  
JIM W. FANG  
Assistant United States Attorney  
*Counsel for the United States*

IT IS SO ORDERED.



Cam Ferenbach  
United States Magistrate Judge

DATED 1-25-2022